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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$40,000.00 IN  
U.S. CURRENCY,

15 Defendant.

2:21-MC-00044-TLN-CKD

16

17 **STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE**

18 It is hereby stipulated by and between the United States of America and potential claimant Karen DeGuzman (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 24, 2020, claimant filed a claim in the administrative forfeiture  
20 proceeding with the Federal Bureau of Investigation (“FBI”) with respect to the Approximately \$40,000.00  
21 in U.S. Currency (hereafter “defendant currency”), which was seized on September 15, 2020.

22 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A)  
23 to all known interested parties. The time has expired for any person to file a claim to the defendant currency  
24 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant  
25 currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
2 That deadline is February 22, 2021.

3       4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to March  
4 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
6 forfeiture.

7       5. Accordingly, the parties agree that the deadline by which the United States shall be required  
8 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
9 the defendant currency is subject to forfeiture shall be extended to **March 22, 2021**.

10  
11 Dated: 02/22/21

McGREGOR W. SCOTT  
United States Attorney

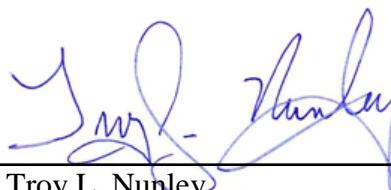
12 By: /s/ Kevin C. Khasigian  
13 KEVIN C. KHASIGIAN  
14 Assistant United States Attorney

15  
16 Dated: 02/22/21

/s/ Justin L. Ward  
JUSTIN L. WARD  
Attorney for potential claimant  
Karen DeGuzman  
(Signature authorized by phone)

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21 **IT IS SO ORDERED.**

22 Dated: February 22, 2021



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Troy L. Nunley  
United States District Judge